



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2323

DATE SCANNED 9/9/11

SCANNER NO. 2

SCAN OPERATOR EE5

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 10, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Paimer  
Acting Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Jodi Winnip/Sari Pickenall *JP*  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Reason To Believe Recommendation -  
2010 12 Day Pre-General Report (Unauthorized Quarterly Filers) for the  
Administrative Fine Program

We are withdrawing the document circulated to the Commission on March 9, 2011 in order to remove a monthly filing committee which was included on the list in error. The committee was previously included on the Reason to Believe Recommendation for the 2010 12 Day Pre-General Report (Unauthorized Monthly Filers) which was approved by the Commission on February 2, 2011.

Attached is a list of political committees and their treasurers who failed to file or timely file the 2010 12 Day Pre-General Report in accordance with 2 U.S.C. § 434(a). The list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2010 through October 13, 2010, and failed to file or timely file the 2010 12 Day Pre-General Report.

The committees appearing on the 2010 12 Day Pre-General Report list failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachments.

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As noted above, the 2010 12 Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2010 through October 13, 2010, but failed to file or timely file the 2010 12 Day Pre-General Election report. In order to accurately identify these committees for administrative fine purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12G) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed General Election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2010 through November 22, 2010 (53 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 25% (13 days (12G Filing Period)/53 days (30G Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G.

#### **Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 2 U.S.C. § 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.
2. Send the appropriate letters.

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## Federal Election Commission

## Reason to Believe Circulation Report

2010 PRE-GENERAL Election Sensitive 10/21/2010 UNAUTH\_Q

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2301	C00392290	ACE CASH EXPRESS INC PAC		DAVID DODSON	\$361,085	1	1/28/2011	Not Filed	\$3,612	\$687
2302	C00132092	ALLIANT ENERGY CORPORATION EMPLOYEE'S POLITICAL ACTION COMM.		KATHRYN J. BARNETT	\$138,267	0	11/29/2010	Not Filed	\$3,338	\$550
2303	C00198259	AMERICAN ASSN. FOR MARRIAGE & FAMILY THERAPY COMM. ADVNCMNT OF MARITAL & FAMILY THERAPY		TRACY TODD	\$148,877	0	12/10/2010	Not Filed	\$1,000	\$550
2305	C00161570	AMERICAN PUBLIC POWER ASSOCIATION, PUBLIC OWNERSHIP OF ELECTRIC RESOURCES PAC		MICHELLE LYNN CHANDLER	\$197,125	1	12/7/2010	Not Filed	\$1,396	\$687
2306	C00177741	ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC)		JOSEPH P. DWYER	\$141,900	0	12/28/2010	Not Filed	\$39,600	\$1,400
2307	C00395947	BARNES & THORNBURG POLITICAL ACTION COMMITTEE		JOHN KOENIG	\$223,788	0	11/30/2010	Not Filed	\$7,606	\$680
2308	C00359588	BGR PAC		LANNY GRIFFITH	\$188,393	0	12/2/2010	Not Filed	\$2,454	\$550
2309	C00415752	BORDER HEALTH FEDERAL PAC		ERNIE PEREZ	\$1,113,002	1	12/2/2010	Not Filed	\$7,679	\$825
2310	C00142315	BOYD GAMING POLITICAL ACTION COMMITTEE		RICK DARNOLD	\$225,302	0	12/3/2010	Not Filed	\$2,700	\$550
2311	C00201863	BURSON- MARSTELLER/YOUNG & RUBICAM POLITICAL ACTION COMMITTEE		M. B. OGLESBY	\$161,311	0	11/29/2010	Not Filed	\$4,500	\$550

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2313	C00455600	COMMONWEALTH BRANDS INC. EMPLOYEE PAC		MARY LOVEALL	\$233,392	0	12/2/2010	Not Filed	\$25,180	\$1,400
2314	C00218172	CONSERVATIVE VICTORY COMMITTEE		LEIF E. NOREN	\$505,566	0	12/6/2010	Not Filed	\$3,379	\$550
2315	C00407635	CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC)		ROBERT MUCCIO	\$317,230	0	12/8/2010	Not Filed	\$6,100	\$660
2316	C00480228	CONTINUING AMERICA'S STRENGTH AND SECURITY PAC		RALPH J. STEPHENS	\$228,942	0	1/31/2011	Not Filed	\$9,640	\$660
2317	C00462630	COVINGTON AND BURLING LLP PAC		RODERICK A. DEARMONT, ESQ.	\$551,969	0	12/1/2010	Not Filed	\$16,574	\$990
2318	C00078535	DIRECT SELLING ASSOCIATION POLITICAL ACTION COMMITTEE		JOSEPH N. MARIANO	\$107,278	0	1/4/2011	Not Filed	\$9,500	\$660
2319	C00380303	EMERGENT BIOSOLUTIONS INC EMPLOYEES PAC		THOMAS MORAN	\$325,615	0	12/3/2010	Not Filed	\$7,102	\$660
2320	C00462879	EXPEDIA INC POLITICAL ACTION COMMITTEE		BRENT THOMPSON	\$129,676	0	12/7/2010	Not Filed	\$1,012	\$550
2321	C00362178	FAMILY-PAC FEDERAL		D. PAUL CAPRIO	\$163,566	1	12/27/2010	Not Filed	\$7,331	\$825
2322	C00400317	FULTON FINANCIAL CORPORATION PAC		MICHAEL J. DEPORTER	\$135,428	0	12/23/2010	Not Filed	\$5,208	\$660
2323	C00344754	GIBSON DUNN & CRUTCHER LLP PAC		CHARLES E. WOODHOUSE	\$237,752	0	12/1/2010	Not Filed	\$5,000	\$660
2324	C00437798	HEARPAC OF HEARING INDUSTRIES ASSOCIATION		JEROME RUZICKA	\$266,830	0	1/4/2011	Not Filed	\$3,500	\$550
2325	C00264689	ILLINOIS POLITICAL ACTIVE LETTER CARRIERS		JACK HENIFF	\$169,111	0	11/24/2010	Not Filed	\$5,411	\$660
2326	C00082636	INDIANA DENTAL PAC		RAYMOND MADDOX	\$179,678	0	12/3/2010	Not Filed	\$5,768	\$660
2327	C00084822	INTERNATIONAL ASSOCIATION OF HOLIDAY INNS INN-PAC		EVA FERGUSON	\$181,666	0	12/2/2010	Not Filed	\$6,755	\$660

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2328	C00382226	INTERNATIONAL SECURITIES EXCHANGE PAC		BRUCE COOPERMAN	\$125,227	0	1/5/2011	Not Filed	\$10,500	\$980
2329	C00136739	IUOE OPERATING ENGINEERS		JAMES JONES	\$634,513	0	12/8/2010	Not Filed	\$43,040	\$1,400
2330	C00370791	MAJORITY INITIATIVE TO KEEP ELECTING REPUBLICANS FUND A.K.A MIKE R FUND		ROBERT F. CARLIN	\$902,801	0	12/2/2010	Not Filed	\$32,194	\$1,400
2331	C00086348	NATIONAL ASSOCIATION FOR UNIFORMED SERVICES PAC		MICHAEL F. HARRIS	\$230,759	1	11/30/2010	Not Filed	\$4,884	\$687
2332	C00254201	NATIONAL ASSOCIATION OF MORTGAGE BROKERS		RYAN C. RIESTERER	\$146,153	0	12/2/2010	Not Filed	\$5,000	\$680
2333	C00450916	NEW ASURION CORP. EMPLOYEES FEDERAL POLITICAL ACTION COMMITTEE		MIKE AIN	\$309,448	0	12/2/2010	Not Filed	\$2,500	\$550
2334	C00443523	NEWFIELD EXPLORATION COMPANY POLITICAL ACTION COMMITTEE (NEWFIELD PAC)		SUSAN G. RIGGS	\$374,665	0	12/1/2010	Not Filed	\$42,500	\$1,400
2335	C00347112	INSURANCE COMPANY PMI MORTGAGE FEDERAL PAC		RAY CHANG	\$121,518	0	12/3/2010	Not Filed	\$13,000	\$980
2336	C00246736	SEABOARD CORPORATION POLITICAL ACTION COMMITTEE		DAVID M. DANNOV	\$147,906	0	12/29/2010	Not Filed	\$2,439	\$550
2337	C00459065	STINSON MORRISON HECKER POLITICAL ACTION COMMITTEE PAC		PHILLIP L. FRAAS	\$177,723	0	12/8/2010	Not Filed	\$2,250	\$550
2338	C00278788	SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE		WILLIAM RATHJEN	\$146,579	1	12/26/2010	Not Filed	\$15,961	\$1,237
2339	C00009357	THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		MITCH GLAZIER	\$221,435	0	1/10/2011	Not Filed	\$17,500	\$980

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2340	C00274431	UNITEDHEALTH GROUP INCORPORATED PAC (UNITED FOR HEALTH)		SUSAN SHERWOOD	\$1,742,433	0	12/8/2010	Not Filed	\$36,619	\$1,400
2341	C00202184	WATERPAC - NATIONAL RURAL WATER ASSOCIATION POLITICAL COMMITTEE		ROBERT JOHNSON	\$251,677	0	12/2/2010	Not Filed	\$6,493	\$880
2342	C00426569	WESTERN ENERGY ALLIANCE PAC		KATHLEEN M. SGAMMA	\$138,702	0	12/3/2010	Not Filed	\$3,346	\$550

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Withdrawal and Resubmission of Reason )  
To Believe Recommendation - 2010 12 Day )  
Pre-General Report (Unauthorized )  
Quarterly Filers) for the Administrative Fine )  
Program: )  
ACE CASH EXPRESS INC PAC, and ) AF# 2301  
DAVID DODSON as treasurer; )  
ALLIANT ENERGY CORORATION ) AF# 2302  
EMPLOYEE'S POLITICAL ACTION )  
COMM, and BARNETT, KATHRYN J as )  
treasurer; )  
AMERICAN ASSN. FOR MARRIAGE & ) AF# 2303  
FAMILY THERAPY COMM. )  
ADVNCMNT OF MARITAL & FAMILY )  
THERAPY, and TODD, TRACY as )  
treasurer; )  
AMERICAN PUBLIC POWER ) AF# 2305  
ASSOCIATION, PUBLIC OWNERSHIP )  
OF ELECTRIC RESOURCES PAC, and )  
CHANDLER, MICHELLE LYNN as )  
treasurer; )  
ASPLUNDH TREE EXPERT CO ) AF# 2306  
POLITICAL ACTION COMMITTEE )  
(ATE PAC), and DWYER, JOSEPH P as )  
treasurer; )  
BARNES & THORNBURG POLITICAL ) AF# 2307  
ACTION COMMITTEE, and KOENIG, )  
JOHN as treasurer; )  
BGR PAC, and GRIFFITH, LANNY as ) AF# 2308  
treasurer; )  
BORDER HEALTH FEDERAL PAC, and ) AF# 2309  
PEREZ, ERNIE as treasurer; )  
BOYD GAMING POLITICAL ACTION ) AF# 2310  
COMMITTEE, and DARNOLD, RICK as )  
treasurer; )  
BURSON-MARSTELLER/YOUNG & ) AF# 2311  
RUBICAM POLITICAL ACTION )  
COMMITTEE, and OGLESBY, M. B. as )  
treasurer; )

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COMMONWEALTH BRANDS INC.	)	AF# 2313
EMPLOYEE PAC, and MARY, LOVEALL	)	
as treasurer;	)	
CONSERVATIVE VICTORY	)	AF# 2314
COMMITTEE, and LEIF E NOREN as	)	
treasurer;	)	
CONSOLIDATED EDISON INC	)	AF# 2315
EMPLOYEES' POLITICAL ACTION	)	
COMMITTEE (CEIPAC), and MUCCILO,	)	
ROBERT as treasurer;	)	
CONTINUING AMERICA'S STRENGTH	)	AF# 2316
AND SECURITY PAC, and STEPHENS,	)	
RALPH J. as treasurer;	)	
COVINGTON AND BURLING LLP PAC,	)	AF# 2317
and DEARMENT, RODERICK A. ESQ. as	)	
treasurer;	)	
DIRECT SELLING ASSOCIATION	)	AF# 2318
POLITICAL ACTION COMMITTEE, and	)	
MARIANO, JOSEPH N. as treasurer;	)	
EMERGENT BIOSOLUTIONS INC	)	AF# 2319
EMPLOYEES PAC, and MORAN,	)	
THOMAS as treasurer;	)	
EXPEDIA INC POLITICAL ACTION	)	AF# 2320
COMMITTEE, and BRENT THOMPSON	)	
as treasurer;	)	
FAMILY-PAC FEDERAL, and D PAUL	)	AF# 2321
CAPRIO as treasurer;	)	
FULTON FINANCIAL CORPORATION	)	AF# 2322
PAC, and MICHAEL J DEPORTER as	)	
treasurer;	)	
GIBSON DUNN & CRUTCHER LLP	)	AF# 2323
PAC, and CHARLES E WOODHOUSE as	)	
treasurer;	)	
HEARPAC OF HEARING INDUSTRIES	)	AF# 2324
ASSOCIATION, and RUZICKA, JEROME	)	
as treasurer;	)	
ILLINOIS POLITICAL ACTIVE LETTER	)	AF# 2325
CARRIERS, and HENIFF, JACK MR. as	)	
treasurer;	)	
INDIANA DENTAL PAC, and MADDOX,	)	AF# 2326
RAYMOND as treasurer;	)	

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INTERNATIONAL ASSOCIATION OF	)	AF# 2327
HOLIDAY INNS INN-PAC, and	)	
FERGUSON, EVA MS as treasurer;	)	
INTERNATIONAL SECURITIES	)	AF# 2328
EXCHANGE PAC, and COOPERMAN,	)	
BRUCE as treasurer;	)	
IUOE OPERATING ENGINEERS, and	)	AF# 2329
JAMES JONES as treasurer;	)	
MAJORITY INITIATIVE TO KEEP	)	AF# 2330
ELECTING REPUBLICANS FUND A.K.A	)	
MIKE R FUND, and CARLIN, ROBERT F	)	
as treasurer;	)	
NATIONAL ASSOCIATION FOR	)	AF# 2331
UNIFORMED SERVICES PAC, and	)	
HARRIS, MICHAEL F. as treasurer;	)	
NATIONAL ASSOCIATION OF	)	AF# 2332
MORTGAGE BROKERS, and	)	
RIESTERER, RYAN C. as treasurer;	)	
NEW ASURION CORP. EMPLOYEES	)	AF# 2333
FEDERAL POLITICAL ACTION	)	
COMMITTEE, and AIN, MIKE as	)	
treasurer;	)	
NEWFIELD EXPLORATION COMPANY	)	AF# 2334
POLITICAL ACTION COMMITTEE	)	
(NEWFIELD PAC), and RIGGS, SUSAN	)	
G. MRS. as treasurer;	)	
PMI MORTGAGE INSURANCE	)	AF# 2335
COMPANY FEDERAL PAC, and	)	
CHANG, RAY as treasurer;	)	
SEABOARD CORPORATION	)	AF# 2336
POLITICAL ACTION COMMITTEE, and	)	
DAVID M DANNOV as treasurer;	)	
STINSON MORRISON HECKER	)	AF# 2337
POLITICAL ACTION COMMITTEE PAC,	)	
and PHILLIP L FRAAS as treasurer;	)	
SUFFOLK COUNTY DETECTIVES	)	AF# 2338
ASSN INC., POLITICAL ACTION	)	
COMMITTEE, and WILLIAM RATHJEN,	)	
TREASURER as treasurer;	)	
THE RECORDING INDUSTRY	)	AF# 2339
ASSOCIATION OF AMERICA	)	
POLITICAL ACTION COMMITTEE, and	)	
GLAZIER, MITCH as treasurer;	)	

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UNITEDHEALTH GROUP ) AF# 2340  
INCORPORATED PAC (UNITED FOR )  
HEALTH), and SHERWOOD SUSAN as )  
treasurer; )  
WATERPAC - NATIONAL RURAL ) AF# 2341  
WATER ASSOCIATION POLITICAL )  
COMMITTEE, and JOHNSON, ROBERT )  
as treasurer; )  
WESTERN ENERGY ALLIANCE PAC, ) AF# 2342  
and SGAMMA, KATHLEEN M as )  
treasurer; )

**CERTIFICATION**

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 11, 2011 the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation - 2010 12 Day Pre-General Report (Unauthorized Quarterly Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 10, 2011, on the following committees:

**AF#2301** Decided by a vote of 6-0 to: (1) find reason to believe that ACE CASH EXPRESS INC PAC, and DAVID DODSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

**AF#2302** Decided by a vote of 6-0 to: (1) find reason to believe that ALLIANT ENERGY CORPORATION EMPLOYEE'S POLITICAL ACTION COMM, and BARNETT, KATHRYN J as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

**AF#2303** Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN ASSN. FOR MARRIAGE & FAMILY THERAPY COMM. ADVNCMNT OF

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MARITAL & FAMILY THERAPY, and TODD, TRACY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2305 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PUBLIC POWER ASSOCIATION, PUBLIC OWNERSHIP OF ELECTRIC RESOURCES PAC, and CHANDLER, MICHELLE LYNN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2306 Decided by a vote of 6-0 to: (1) find reason to believe that ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC), and DWYER, JOSEPH P as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2307 Decided by a vote of 6-0 to: (1) find reason to believe that BARNES & THORNBURG POLITICAL ACTION COMMITTEE, and KOENIG, JOHN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2308 Decided by a vote of 6-0 to: (1) find reason to believe that BGR PAC, and GRIFFITH, LANNY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2309 Decided by a vote of 6-0 to: (1) find reason to believe that BORDER HEALTH FEDERAL PAC, and PEREZ, ERNIE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2310 Decided by a vote of 6-0 to: (1) find reason to believe that BOYD GAMING POLITICAL ACTION COMMITTEE, and DARNOLD, RICK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter.

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Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2311 Decided by a vote of 6-0 to: (1) find reason to believe that BURSON-MARSTELLER/YOUNG & RUBICAM POLITICAL ACTION COMMITTEE, and OGLESBY, M. B. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2313 Decided by a vote of 6-0 to: (1) find reason to believe that COMMONWEALTH BRANDS INC. EMPLOYEE PAC, and MARY, LOVEALL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2314 Decided by a vote of 6-0 to: (1) find reason to believe that CONSERVATIVE VICTORY COMMITTEE, and LEIF E NOREN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2315 Decided by a vote of 6-0 to: (1) find reason to believe that CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC), and MUCCILO, ROBERT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2316 Decided by a vote of 6-0 to: (1) find reason to believe that CONTINUING AMERICA'S STRENGTH AND SECURITY PAC, and STEPHENS, RALPH J. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2317 Decided by a vote of 6-0 to: (1) find reason to believe that COVINGTON AND BURLING LLP PAC, and DEARMENT, RODERICK A. ESQ. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2318 Decided by a vote of 6-0 to: (1) find reason to believe that DIRECT SELLING ASSOCIATION POLITICAL ACTION COMMITTEE, and MARIANO, JOSEPH N. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2319 Decided by a vote of 6-0 to: (1) find reason to believe that EMERGENT BIOSOLUTIONS INC EMPLOYEES PAC, and MORAN, THOMAS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2320 Decided by a vote of 6-0 to: (1) find reason to believe that EXPEDIA INC POLITICAL ACTION COMMITTEE, and BRENT THOMPSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2321 Decided by a vote of 6-0 to: (1) find reason to believe that FAMILY-PAC FEDERAL, and D PAUL CAPRIO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2322 Decided by a vote of 6-0 to: (1) find reason to believe that FULTON FINANCIAL CORPORATION PAC, and MICHAEL J DEPORTER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2323 Decided by a vote of 6-0 to: (1) find reason to believe that GIBSON DUNN & CRUTCHER LLP PAC, and CHARLES H WOODHOUSE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter.

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Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2324 Decided by a vote of 6-0 to: (1) find reason to believe that HEARPAC OF HEARING INDUSTRIES ASSOCIATION, and RUZICKA, JEROME as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2325 Decided by a vote of 6-0 to: (1) find reason to believe that ILLINOIS POLITICAL ACTIVE LETTER CARRIERS, and HENIFF, JACK MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2326 Decided by a vote of 6-0 to: (1) find reason to believe that INDIANA DENTAL PAC, and MADDOX, RAYMOND as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2327 Decided by a vote of 6-0 to: (1) find reason to believe that INTERNATIONAL ASSOCIATION OF HOLIDAY INNS INN-PAC, and FERGUSON, EVA MS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2328 Decided by a vote of 6-0 to: (1) find reason to believe that INTERNATIONAL SECURITIES EXCHANGE PAC, and COOPERMAN, BRUCE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2329 Decided by a vote of 6-0 to: (1) find reason to believe that IUOE OPERATING ENGINEERS, and JAMES JONES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2330 Decided by a vote of 6-0 to: (1) find reason to believe that MAJORITY INITIATIVE TO KEEP ELECTING REPUBLICANS FUND A.K.A MIKE R FUND,

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and CARLIN, ROBERT F as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2331 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ASSOCIATION FOR UNIFORMED SERVICES PAC, and HARRIS, MICHAEL F. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2332 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ASSOCIATION OF MORTGAGE BROKERS, and RIESTERER, RYAN C. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2333 Decided by a vote of 6-0 to: (1) find reason to believe that NEW ASURION CORP. EMPLOYEES FEDERAL POLITICAL ACTION COMMITTEE, and AIN, MIKE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2334 Decided by a vote of 6-0 to: (1) find reason to believe that NEWFIELD EXPLORATION COMPANY POLITICAL ACTION COMMITTEE (NEWFIELD PAC), and RIGGS, SUSAN G. MRS. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2335 Decided by a vote of 6-0 to: (1) find reason to believe that PMI MORTGAGE INSURANCE COMPANY FEDERAL PAC, and CHANG, RAY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2336 Decided by a vote of 6-0 to: (1) find reason to believe that SEABOARD CORPORATION POLITICAL ACTION COMMITTEE, and DAVID M DANNON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate

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Federal Election Commission  
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March 11, 2011

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letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2337 Decided by a vote of 6-0 to: (1) find reason to believe that STINSON MORRISON HECKER POLITICAL ACTION COMMITTEE PAC, and PHILLIP L FRAAS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2338 Decided by a vote of 6-0 to: (1) find reason to believe that SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE, and WILLIAM RATHJEN, TREASURER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2339 Decided by a vote of 6-0 to: (1) find reason to believe that THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and GLAZIER, MITCH as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2340 Decided by a vote of 6-0 to: (1) find reason to believe that UNITEDHEALTH GROUP INCORPORATED PAC (UNITED FOR HEALTH), and SHERWOOD SUSAN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2341 Decided by a vote of 6-0 to: (1) find reason to believe that WATERPAC - NATIONAL RURAL WATER ASSOCIATION POLITICAL COMMITTEE, and JOHNSON, ROBERT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2342 Decided by a vote of 6-0 to: (1) find reason to believe that WESTERN ENERGY ALLIANCE PAC, and SGAMMA, KATHLEEN M as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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Federal Election Commission  
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Attest:

March 14, 2011  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 14, 2011

Charles E. Woodhouse, in official capacity as Treasurer  
Gibson Dunn & Crutcher LLP PAC  
333 South Grand Avenue  
Los Angeles, CA 90071

C00344754  
AF#: 2323

Dear Mr. Woodhouse:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report is required if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period through October 13, 2010, shall be filed no later than October 21, 2010. 2 U.S.C. § 434(a). Because records at the Federal Election Commission ("FEC") indicate that this report was not filed prior to four (4) days before the General Election held on November 2, 2010, it is considered not filed for the purpose of calculating the civil money penalty.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On March 11, 2011, the FEC found that there is reason to believe ("RTB") that Gibson Dunn & Crutcher LLP PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before October 21, 2010. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$660. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$660 is due within forty (40) days of the finding, or by April 20, 2011, and is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$5,000

Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 2, 2010 are considered not filed for the purpose of calculating the civil money penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

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### 1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or April 20, 2011. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 C.F.R. § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

### 2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Gibson Dunn & Crutcher LLP PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection

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Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Cynthia L. Bauerly  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at RTB is \$660 for the 2010 Pre-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by April 20, 2011. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Gibson Dunn & Crutcher LLP PAC

FEC ID#: C00344754

AF#: 2323

PAYMENT DUE DATE: April 20, 2011

PAYMENT AMOUNT DUE: \$660

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 21, 2011

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Acting Staff Director

FROM: Patricia Carmena *PC*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *W*odi Winship/Sari Pickerall *SP*  
Compliance Branch

SUBJECT: Administrative Fine Program - Final Determination Recommendation for the  
2010 12 Day Pre-General Report (Unauthorized Committees-Quarterly Filers)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2010 12 Day Pre-General Report (Unauthorized Committees-Quarterly Filers). The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, Indiana Dental PAC (AF 2326) filed an amended 2010 30 Day Post-General Report which included the coverage dates for the 12 Day Pre-General Report (10/1/2010 to 10/13/2010) after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$2,768 (previously estimated to be \$5,768), thus the fine would be lowered from \$660 to \$550.

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**RAD Recommendation**

- (1) Make final determination that the political committees and their treasurers listed on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

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AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2301	ACE CASH EXPRESS INC PAC		C00392290	DAVID DODSON	01/28/2011	Not Filed	\$3,612	1	03/11/2011	\$687	\$687	04/25/2011	\$687
2302	ALLIANT ENERGY CORPORATION EMPLOYEE'S POLITICAL ACTION COMM.		C00132092	KATHRYN J. BARNETT	11/29/2010	Not Filed	\$3,338	0	03/11/2011	\$550	\$550	04/22/2011	\$550
2303	AMERICAN ASSN. FOR MARRIAGE & FAMILY THERAPY COMM. ADVNCMENT OF MARITAL & FAMILY THERAPY		C00198259	TRACY TODD	12/10/2010	Not Filed	\$1,000	0	03/11/2011	\$550	\$550	04/18/2011	\$550
2305	AMERICAN PUBLIC POWER ASSOCIATION, PUBLIC OWNERSHIP OF ELECTRIC RESOURCES PAC		C00161570	MICHELLE LYNN CHANDLER	12/07/2010	Not Filed	\$1,386	1	03/11/2011	\$687	\$687	04/19/2011	\$687
2306	ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC)		C00177741	JOSEPH P. DWYER	12/28/2010	Not Filed	\$39,600	0	03/11/2011	\$1,400	\$1,400	04/19/2011	\$1,400
2307	BARNES & THORNBURG POLITICAL ACTION COMMITTEE		C00392947	JOHN KOENIG	11/30/2010	Not Filed	\$7,806	0	03/11/2011	\$660	\$660	03/31/2011	\$660
2308	BGR PAC		C00395868	LANNY GRIFFITH	12/02/2010	Not Filed	\$2,203	0	03/11/2011	\$550	\$550	04/19/2011	\$550
2309	BORDER HEALTH FEDERAL PAC		C00415752	ERNIE PEREZ	12/02/2010	Not Filed	\$7,679	1	03/11/2011	\$625	\$625	04/21/2011	\$625
2311	MARSTELLERYOUNG & RUBICAMP/PRIME POLICY GROUP POLITICAL ACTION COMMITTEE		C00201863	M. B. OGLESBY, JR.	11/29/2010	Not Filed	\$4,500	0	03/11/2011	\$550	\$550	03/22/2011	\$550
2313	COMMONWEALTH BRANDS INC. EMPLOYEE PAC		C00453600	MARY LOVEALL	12/02/2010	Not Filed	\$25,180	0	03/11/2011	\$1,400	\$1,400	05/18/2011	\$1,400
2314	CONSERVATIVE VICTORY COMMITTEE		C00218172	LEIF E. NOREN	12/06/2010	Not Filed	\$3,379	0	03/11/2011	\$550	\$550	03/25/2011	\$550
2315	CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE (CEIPAC)		C00407635	ROBERT MUCCIO	12/08/2010	Not Filed	\$6,100	0	03/11/2011	\$660	\$660	04/19/2011	\$660
2316	CONTINUING AMERICA'S STRENGTH AND SECURITY PAC		C00480228	RALPH J. STEPHENS	01/31/2011	Not Filed	\$9,840	0	03/11/2011	\$660	\$660	04/04/2011	\$660
2317	COVINGTON AND BURLING LLP PAC		C00462630	RODERICK A. DEARMONT, ESQ.	12/01/2010	Not Filed	\$18,574	0	03/11/2011	\$990	\$990	04/18/2011	\$990
2318	DIRECT SELLING ASSOCIATION POLITICAL ACTION COMMITTEE		C00078535	JOSEPH N. MARIANO	01/04/2011	Not Filed	\$9,500	0	03/11/2011	\$660	\$660	04/14/2011	\$660
2319	EMERGENT BIOSOLUTIONS INC EMPLOYEES PAC		C00380303	THOMAS MORAN	12/03/2010	Not Filed	\$7,102	0	03/11/2011	\$660	\$660	04/11/2011	\$660

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AP#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2320	EXPEDIA INC POLITICAL ACTION COMMITTEE		C00462879	BRENT THOMPSON	12/07/2010	Not Filed	\$1,012	0	03/11/2011	\$550	\$550	03/29/2011	\$550
2321	FAMILY-PAC FEDERAL		C00362178	D. PAUL CAPRIO	12/27/2010	Not Filed	\$7,331	1	03/11/2011	\$825	\$825	04/14/2011	\$825
2322	FULTON FINANCIAL CORPORATION PAC		C00400317	MICHAEL J. DEPORTER	12/23/2010	Not Filed	\$5,208	0	03/11/2011	\$660	\$660	04/19/2011	\$660
2323	GIBSON DUNN & CRUTCHER LLP PAC		C00344754	CHARLES E. WOODHOUSE	12/01/2010	Not Filed	\$5,000	0	03/11/2011	\$660	\$660	04/01/2011	\$660
2324	HEARPAC OF HEARING INDUSTRIES ASSOCIATION		C00437798	JEROME RUZICKA	01/04/2011	Not Filed	\$3,500	0	03/11/2011	\$550	\$550	04/19/2011	\$550
2325	ILLINOIS POLITICAL ACTIVE LETTER CARRIERS		C00284689	JACK HENIFF	11/24/2010	Not Filed	\$5,411	0	03/11/2011	\$660	\$660	03/24/2011	\$660
2326	INTERNATIONAL ASSOCIATION OF HOLIDAY INN'S INN-PAC		C00084822	EVA FERGUSON	12/02/2010	Not Filed	\$6,755	0	03/11/2011	\$660	\$660	04/05/2011	\$660
2328	INTERNATIONAL SECURITIES EXCHANGE PAC		C00362228	BRUCE COOPERMAN	01/05/2011	Not Filed	\$10,500	0	03/11/2011	\$990	\$990	03/17/2011	\$990
2329	IJOE OPERATING ENGINEERS		C00136739	JAMES JONES	12/08/2010	Not Filed	\$43,040	0	03/11/2011	\$1,400	\$1,400	04/21/2011	\$1,400
2330	MAJORITY INITIATIVE TO KEEP ELECTING REPUBLICANS FUND A.K.A. MIKE R FUND		C00370791	ROBERT F. CARLIN	12/02/2010	Not Filed	\$32,194	0	03/11/2011	\$1,400	\$1,400	03/24/2011	\$1,400
2331	NATIONAL ASSOCIATION FOR UNIFORMED SERVICES PAC		C00086348	MICHAEL F. HARRIS	11/30/2010	Not Filed	\$4,884	1	03/11/2011	\$667	\$667	08/13/2011	\$667
2332	NATIONAL ASSOCIATION OF MORTGAGE BROKERS NEW ASURION CORP.		C00254201	RYAN C. RIESTERER	12/02/2010	Not Filed	\$5,000	0	03/11/2011	\$660	\$660	04/21/2011	\$660
2333	EMPLOYEES FEDERAL POLITICAL ACTION COMMITTEE		C00450918	MIKE AIN	12/02/2010	Not Filed	\$2,500	0	03/11/2011	\$550	\$550	04/19/2011	\$550
2334	NEWFIELD EXPLORATION COMPANY POLITICAL ACTION COMMITTEE (NEWFIELD PAC)		C00443523	SUSAN G. RIGGS	12/01/2010	Not Filed	\$42,500	0	03/11/2011	\$1,400	\$1,400	04/18/2011	\$1,400
2336	SEABOARD CORPORATION POLITICAL ACTION COMMITTEE		C00246736	DAVID M. DANNOV	12/29/2010	Not Filed	\$2,439	0	03/11/2011	\$550	\$550	04/22/2011	\$550
2337	STINSON MORRISON HECKER POLITICAL ACTION COMMITTEE PAC		C00459085	PHILLIP L. FRAAS	12/08/2010	Not Filed	\$2,250	0	03/11/2011	\$550	\$550	04/14/2011	\$550
2338	SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE		C00278788	WILLIAM RATHJEN	12/26/2010	Not Filed	\$15,961	1	03/11/2011	\$1,237	\$1,237	04/19/2011	\$1,237
2339	THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		C00008357	MITCH GLAZIER	01/10/2011	Not Filed	\$17,500	0	03/11/2011	\$990	\$990	04/19/2011	\$990
2340	UNITED HEALTH GROUP INCORPORATED PAC (UNITED FOR HEALTH)		C00274431	SUSAN SHERWOOD	12/06/2010	Not Filed	\$38,619	0	03/11/2011	\$1,400	\$1,400	03/30/2011	\$1,400

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AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2341	WATERPAC - NATIONAL RURAL WATER ASSOCIATION POLITICAL COMMITTEE		C00202184	ROBERT JOHNSON	12/02/2010	Not Filed	\$17,853	0	03/11/2011	\$660	\$660	04/20/2011	\$660

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2010 12 Day Pre-General Report )  
(Unauthorized Committees-Quarterly )  
Filers): )  
ACE CASH EXPRESS INC PAC, and ) AF# 2301  
DAVID DODSON as treasurer; )  
ALLIANT ENERGY CORPORATION ) AF# 2302  
EMPLOYEE'S POLITICAL ACTION )  
COMM, and BARNETT, KATHRYN J as )  
treasurer; )  
AMERICAN ASSN. FOR MARRIAGE & ) AF# 2303  
FAMILY THERAPY COMM. )  
ADVNCMENT OF MARITAL & FAMILY )  
THERAPY, and TODD, TRACY as )  
treasurer; )  
AMERICAN PUBLIC POWER ) AF# 2305  
ASSOCIATION, PUBLIC OWNERSHIP )  
OF ELECTRIC RESOURCES PAC, and )  
CHANDLER, MICHELLE LYNN as )  
treasurer; )  
ASFLUNDH TREE EXPERT CO ) AF# 2306  
POLITICAL ACTION COMMITTEE )  
(ATE PAC), and DWYER, JOSEPH P as )  
treasurer; )  
BARNES & THORNBURG POLITICAL ) AF# 2307  
ACTION COMMITTEE, and KOENIG, )  
JOHN as treasurer; )  
BORDER HEALTH FEDERAL PAC, and ) AF# 2309  
PEREZ, ERNIE as treasurer; )  
BURSON-MARSTELLER/YOUNG & ) AF# 2311  
RUBICAM/PRIME POLICY GROUP )  
POLITICAL ACTION COMMITTEE, and )  
M. B. OGLESBY JR. as treasurer; )

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COMMONWEALTH BRANDS INC. ) AF# 2313  
EMPLOYEE PAC, and MARY, LOVEALL )  
as treasurer; )  
CONSERVATIVE VICTORY ) AF# 2314  
COMMITTEE, and LEIF E NOREN as )  
treasurer; )  
CONSOLIDATED EDISON INC ) AF# 2315  
EMPLOYEES' POLITICAL ACTION )  
COMMITTEE (CEIPAC), and MUCCILO, )  
ROBERT as treasurer; )  
CONTINUING AMERICA'S STRENGTH ) AF# 2316  
AND SECURITY PAC, and STEPHENS, )  
RALPH J. as treasurer; )  
COVINGTON AND BURLING LLP PAC, ) AF# 2317  
and DEARMENT, RODERICK A. ESQ. as )  
treasurer; )  
DIRECT SELLING ASSOCIATION ) AF# 2318  
POLITICAL ACTION COMMITTEE, and )  
MARIANO, JOSEPH N. as treasurer; )  
EMERGENT BIOSOLUTIONS INC ) AF# 2319  
EMPLOYEES PAC, and MORAN, )  
THOMAS as treasurer; )  
EXPEDIA INC POLITICAL ACTION ) AF# 2320  
COMMITTEE, and BRENT THOMPSON )  
as treasurer; )  
FAMILY-PAC FEDERAL, and D PAUL ) AF# 2321  
CAPRIO as treasurer; )  
FULTON FINANCIAL CORPORATION ) AF# 2322  
PAC, and MICHAEL J DEPORTER as )  
treasurer; )  
GIBSON DUNN & CRUTCHER LLP ) AF# 2323  
PAC, and CHARLES E WOODHOUSE as )  
treasurer; )  
HEARPAC OF HEARING INDUSTRIES ) AF# 2324  
ASSOCIATION, and RUZICKA, JEROME )  
as treasurer; )  
ILLINOIS POLITICAL ACTIVE LETTER ) AF# 2325  
CARRIERS, and HENIFF, JACK MR. as )  
treasurer; )  
INDIANA DENTAL PAC, and MADDOX, ) AF# 2326  
RAYMOND as treasurer; )  
INTERNATIONAL ASSOCIATION OF ) AF# 2327  
HOLIDAY INNS INN-PAC, and )  
FERGUSON, EVA MS as treasurer; )

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June 23, 2011

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INTERNATIONAL SECURITIES	AF# 2328
EXCHANGE PAC, and COOPERMAN,	
BRUCE as treasurer;	
IUOE OPERATING ENGINEERS, and	) AF# 2329
JAMES JONES as treasurer;	)
MAJORITY INITIATIVE TO KEEP	) AF# 2330
ELECTING REPUBLICANS FUND A.K.A	)
MIKE R FUND, and CARLIN, ROBERT F	)
as treasurer;	)
NATIONAL ASSOCIATION FOR	) AF# 2331
UNIFORMED SERVICES PAC, and	)
HARRIS, MICHAEL F. as treasurer;	)
NATIONAL ASSOCIATION OF	) AF# 2332
MORTGAGE BROKERS, and	)
RIESTERER, RYAN C. as treasurer;	)
NEW ASURION CORP. EMPLOYEES	) AF# 2333
FEDERAL POLITICAL ACTION	)
COMMITTEE, and AIN, MIKE as	)
treasurer;	)
NEWFIELD EXPLORATION COMPANY	) AF# 2334
POLITICAL ACTION COMMITTEE	)
(NEWFIELD PAC), and RIGGS, SUSAN	)
G. MRS. as treasurer;	)
PMI MORTGAGE INSURANCE	) AF# 2335
COMPANY FEDERAL PAC, and	)
CHANG, RAY as treasurer;	)
SEABOARD CORPORATION	) AF# 2336
POLITICAL ACTION COMMITTEE, and	)
DAVID M DANNOV as treasurer;	)
STINSON MORRISON HECKER	) AF# 2337
POLITICAL ACTION COMMITTEE PAC,	)
and PHILLIP L FRAAS as treasurer;	)
SUFFOLK COUNTY DETECTIVES	) AF# 2338
ASSN INC., POLITICAL ACTION	)
COMMITTEE, and WILLIAM RATHJEN,	)
TREASURER as treasurer;	)
THE RECORDING INDUSTRY	) AF# 2339
ASSOCIATION OF AMERICA	)
POLITICAL ACTION COMMITTEE, and	)
GLAZIER, MITCH as treasurer;	)
UNITEDHEALTH GROUP	) AF# 2340
INCORPORATED PAC (UNITED FOR	)
HEALTH), and SHERWOOD SUSAN as	)
treasurer;	)

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WATERPAC - NATIONAL RURAL ) AF# 2341  
WATER ASSOCIATION POLITICAL )  
COMMITTEE, and JOHNSON, ROBERT )  
as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 23, 2011 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2010 12 Day Pre-General Report (Unauthorized Committees-Quarterly Filers) as recommended in the Reports Analysis Division's Memorandum dated June 21, 2011, on the following committees:

AF#2301 Decided by a vote of 6-0 to: (1) make a final determination that ACE CASH EXPRESS INC PAC, and DAVID DODSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2302 Decided by a vote of 6-0 to: (1) make a final determination that ALLIANT ENERGY CORPORATION EMPLOYEE'S POLITICAL ACTION COMM, and BARNETT, KATHRYN J as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2303 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN ASSN. FOR MARRIAGE & FAMILY THERAPY COMM. ADVNCMNT OF MARITAL & FAMILY THERAPY, and TODD, TRACY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2305 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN PUBLIC POWER ASSOCIATION, PUBLIC OWNERSHIP OF

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ELECTRIC RESOURCES PAC, and CHANDLER, MICHELLE LYNN as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2306 Decided by a vote of 6-0 to: (1) make a final determination that ASPLUNDH TREE EXPERT CO POLITICAL ACTION COMMITTEE (ATE PAC), and DWYER, JOSEPH P as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2307 Decided by a vote of 6-0 to: (1) make a final determination that BARNES & THORNBURG POLITICAL ACTION COMMITTEE, and KOENIG, JOHN as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2309 Decided by a vote of 6-0 to: (1) make a final determination that BORDER HEALTH FEDERAL PAC, and PEREZ, ERNIE as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2311 Decided by a vote of 6-0 to: (1) make a final determination that BURSON-MARSTELLER/YOUNG & RUBICAM/PRIME POLICY GROUP POLITICAL ACTION COMMITTEE, and M. B. OGLESBY JR. as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2313 Decided by a vote of 6-0 to: (1) make a final determination that COMMONWEALTH BRANDS INC. EMPLOYEE PAC, and MARY, LOYEALL as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2314 Decided by a vote of 6-0 to: (1) make a final determination that CONSERVATIVE VICTORY COMMITTEE, and LEIF E NOREN as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2315 Decided by a vote of 6-0 to: (1) make a final determination that CONSOLIDATED EDISON INC EMPLOYEES' POLITICAL ACTION COMMITTEE

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(CEIPAC), and MUCCILO, ROBERT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2316 Decided by a vote of 6-0 to: (1) make a final determination that CONTINUING AMERICA'S STRENGTH AND SECURITY PAC, and STEPHENS, RALPH J. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2317 Decided by a vote of 6-0 to: (1) make a final determination that COVINGTON AND BURLING LLP PAC, and DEARMENT, RODERICK A. ESQ. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2318 Decided by a vote of 6-0 to: (1) make a final determination that DIRECT SELLING ASSOCIATION POLITICAL ACTION COMMITTEE, and MARIANO, JOSEPH N. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2319 Decided by a vote of 6-0 to: (1) make a final determination that EMERGENT BIOSOLUTIONS INC EMPLOYEES PAC, and MORAN, THOMAS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2320 Decided by a vote of 6-0 to: (1) make a final determination that EXPEDIA INC POLITICAL ACTION COMMITTEE, and BRENT THOMPSON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2321 Decided by a vote of 6-0 to: (1) make a final determination that FAMILY-PAC FEDERAL, and D PAUL CAPRIO as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2322 Decided by a vote of 6-0 to: (1) make a final determination that FULTON FINANCIAL CORPORATION PAC, and MICHAEL J DEPORTER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send

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the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2323 Decided by a vote of 6-0 to: (1) make a final determination that GIBSON DUNN & CRUTCHER LLP PAC, and CHARLES E WOODHOUSE as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2324 Decided by a vote of 6-0 to: (1) make a final determination that HEARPAC OF HEARING INDUSTRIES ASSOCIATION, and RUZICKA, JEROME as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2325 Decided by a vote of 6-0 to: (1) make a final determination that ILLINOIS POLITICAL ACTIVE LETTER CARRIERS, and HENIFF, JACK MR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2326 Decided by a vote of 6-0 to: (1) make a final determination that INDIANA DENTAL PAC, and MADDOX, RAYMOND as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2327 Decided by a vote of 6-0 to: (1) make a final determination that INTERNATIONAL ASSOCIATION OF HOLIDAY INNS INN-PAC, and FERGUSON, EVA MS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2328 Decided by a vote of 6-0 to: (1) make a final determination that INTERNATIONAL SECURITIES EXCHANGE PAC, and COOPERMAN, BRUCE as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2329 Decided by a vote of 6-0 to: (1) make a final determination that IUOE OPERATING ENGINEERS, and JAMES JONES as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2330 Decided by a vote of 6-0 to: (1) make a final determination that MAJORITY INITIATIVE TO KEEP ELECTING REPUBLICANS FUND A.K.A MIKE R FUND, and CARLIN, ROBERT F as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2331 Decided by a vote of 6-0 to: (1) make a final determination that NATIONAL ASSOCIATION FOR UNIFORMED SERVICES PAC, and HARRIS, MICHAEL F. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2332 Decided by a vote of 6-0 to: (1) make a final determination that NATIONAL ASSOCIATION OF MORTGAGE BROKERS, and RIBSTERER, RYAN C. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2333 Decided by a vote of 6-0 to: (1) make a final determination that NEW ASURION CORP. EMPLOYEES FEDERAL POLITICAL ACTION COMMITTEE, and AIN, MIKE as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2334 Decided by a vote of 6-0 to: (1) make a final determination that NEWFIELD EXPLORATION COMPANY POLITICAL ACTION COMMITTEE (NEWFIELD PAC), and RIGGS, SUSAN G. MRS. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2335 Decided by a vote of 6-0 to: (1) make a final determination that PMF MORTGAGE INSURANCE COMPANY FEDERAL PAC, and CHANG, RAY as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2336 Decided by a vote of 6-0 to: (1) make a final determination that SEABOARD CORPORATION POLITICAL ACTION COMMITTEE, and DAVID M DANNOV as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2337 Decided by a vote of 6-0 to: (1) make a final determination that STINSON MORRISON HECKER POLITICAL ACTION COMMITTEE PAC, and PHILLIP L FRAAS as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2338 Decided by a vote of 6-0 to: (1) make a final determination that SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE, and WILLIAM RATHJEN, TREASURER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2339 Decided by a vote of 6-0 to: (1) make a final determination that THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and GLAZIER, MITCH as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2340 Decided by a vote of 6-0 to: (1) make a final determination that UNITED HEALTH GROUP INCORPORATED PAC (UNITED FOR HEALTH), and SHERWOOD SUSAN as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2341 Decided by a vote of 6-0 to: (1) make a final determination that WATERPAC - NATIONAL RURAL WATER ASSOCIATION POLITICAL COMMITTEE, and JOHNSON, ROBERT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 24, 2011  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 24, 2011

Charles E. Woodhouse, in official capacity as Treasurer  
Gibson Dunn & Crutcher LLP PAC  
333 South Grand Avenue  
Los Angeles, CA 90071

C00344754  
AF#: 2323

Dear Mr. Woodhouse:

On March 11, 2011, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Gibson Dunn & Crutcher LLP PAC and its treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2010 Pre-General Report. By letter dated March 14, 2011, the Commission sent notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$660 in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

On April 1, 2011, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 23, 2011 that you, in your official capacity as treasurer, and Gibson Dunn & Crutcher LLP PAC violated 2 U.S.C. § 434(a), assessed a civil money penalty in the amount of \$660 in accordance with 11 C.F.R. § 111.43, and voted to close the file.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Sari Pickerall on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

  
Cynthia L. Bauerly  
Chair

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FOR: Gibson Dunn & Crutcher LLP PAC

FEC ID#: C00344754

AF#: 2323

PAYMENT DUE DATE: April 20, 2011

PAYMENT AMOUNT DUE: \$660

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058  
SEQ# 001 \$ 0000066000 BA# 1 04-01-11 20 4



REVERSE SIDE OF THIS DOCUMENT MAY BE AN ARTIFICIAL WATERMARK VISIBLE WHEN HELD AT AN ANGLE THIS PAPER IS ALTERATION PROTECTED			
<b>GIBSON, DUNN &amp; CRUTCHER LLP</b> 333 South Grand Avenue Los Angeles, California 90071 (213) 229-7000	Wachovia Bank, N.A. Greenville, South Carolina Payable if Desired at Wells Fargo Bank, N.A. 4703-005168	67-1832 Date: March 28, 2011	952615
Pay: Six hundred sixty and 00/100		\$	660.00
PAY TO THE ORDER OF:	FEDERAL ELECTION COMMISSION P.O. BOX 879068 ST. LOUIS, MO 63197-9000	<i>Charles E. Woodhouse</i> CHECK VOID AFTER 90 DAYS	

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usbancorp.  
The New Bank Group



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2323

DATE SCANNED

9/9/11

SCANNER NO.

2

SCAN OPERATOR

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